

ORIGINAL FILE RECEIVED

APR - 6 1992

Federal Communications Commission  
Office of the Secretary

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No. 92-21
Table of Allotments,	)	
FM Broadcast Stations.	)	RM-7796
(Radcliff, Kentucky;	)	
Cave City, Kentucky; and	)	
Santa Claus, Indiana)	)	

To: Mass Media Bureau (Policy & Rules)

COMMENTS IN SUPPORT OF PROPOSED RULE MAKING

W & B Broadcasting, Inc., (W & B), by its attorney, respectfully supports the proposed allotment of Channel 278C3 to Radcliff, Kentucky, in lieu of the presently allotted Channel 278A, as set forth in the Notice of Proposed Rule Making, DA 92-146, released February 12, 1992, in the above-captioned proceeding. W & B hereby incorporates by reference its petition for rule making and reiterates the need of Radcliff for its first wide-area FM channel. Upon finalization of this proceeding and amendment of Section 73.202(b) of the rules as proposed, W & B will promptly prepare and file an appropriate application for this facility. Upon grant of said application, W & B will diligently construct the station.

Approval of W & B's proposal will require a site restriction on the use of Channel 277A at Santa Claus, Indiana. In paragraph 3 of its Notice, the Commission requested W & B to "provide reasonable assurance that transmitter sites conforming to the site restriction are available." W & B hereby provides such assurance with respect to one potential transmitter site, located at 11469 S.600 West, Holland, Indiana. Its coordinates are 38° 13' 03"; 87° 01' 07".

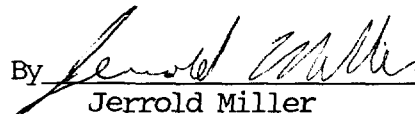
As shown by the attached spacing report, Exhibit 1 hereto, this location is fully spaced to all existing and proposed stations. It should be noted that the exhibit indicates that the site is short by 0.16 km to the transmitter site of WGBF-FM, Henderson, KY. However, the Commission rounds off all spacings to the nearest kilometer. See Section 73.208(c)(8) of the rules. As a result, there is adequate spacing to WGBF-FM.

A Class A station from this site, using maximum facilities, would provide a signal in excess of 70 dBu to all of Santa Claus, thus meeting the "city-grade" coverage requirement. The details of such coverage are presented in the attached Exhibit 2. Reasonable assurance for the use of this site has been obtained from the co-executor of the estate of the deceased owner. His statement is presented in Exhibit 3.

Accordingly, W & B has shown that there is reasonable assurance of a transmitter site for the Santa Claus station which would meet all Commission requirements. The Commission should amend its rules by substituting Channel 278C3 for Channel 278A at Radcliff, Kentucky.

Respectfully submitted,

W & B BROADCASTING CORPORATION

By   
Jerrold Miller  
Its Attorney

April 6, 1992

Miller & Miller, P.C.  
P. O. Box 33003  
Washington, DC 20033

FM Spacing study

Title: PROPOSED CHANNEL 277A; SANTA CLAUS. IN  
Channel 277A (103.3 MHz)  
Database: DW 03/17/92

Latitude: 38-13-03  
Longitude: 87-01-07  
Safety zone: 20 km

Ex. 1

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
WBKR	LIC	OWENSBORO BROADCASTING C	223C	100	37-36-29	182.6	67.72	29
OWENSBORO	KY	BLH-870121KD	92.5	320BT	87-03-15	2.6	38.72	CLEAR
Affiliated with WOMI(AM)								

WSKT	LIC	RCR COMMUNICATIONS INC	224A	1	39-15-18	6.6	116.0	10
SPENCER	IN	BLH-831031AM	92.7	146	86-51-51	186.7	106.0	CLEAR
Was WLSO 08/01/88								

WVPV	CP	BEAVER DAM BROADCASTING	274A	3	37-20-15	170.0	99.19	31
BEAVER DAM	KY	BMPH-891213IF	102.7	100	86-49-21	350.1	68.19	CLEAR
Deletion proposed; CP Granted 05/02/90 per FCC release #20853 dated 05/09/90:								
Call Granted 09/26/89								

WKCM-FM CP	HANCOCK COMMUNICATIONS I	275A	2.20	37-55-33	141.2	41.54	31	
CANNELTON	IN BPH-880823ME	102.9	113	86-43-19	321.4	10.54	CLOSE	
Deletion proposed; CP Granted 03/30/90 per FCC release #20834 dated 04/16/90:								
Call Granted 04/20/90 per FCC release #133 dated 05/04/90								

PRM	CLASS CHANGE TO C3 PROPO	275A		37-55-33	141.2	41.54	31	
CANNELTON	IN DOC-91-271	102.9		86-43-19	321.4	10.54	CLOSE	
Deletion proposed; PRM adopted 09/06/91, released 09/30/91								

PRM	CLASS CHANGE FROM A PROP	275C3		37-51-00	138.0	54.90	42	
CANNELTON	IN DOC-91-271	102.9		86-36-00	318.2	12.90	CLOSE	
PRM adopted 09/06/91, released 09/30/91; SITE RESTRICTION 9.2 MI SE: OPTION II								

WGBF-FM LIC	AIKEN COMMUNICATIONS COR	276A	1.70	37-46-54	227.7	71.84	72	
HENDERSON	KY BLH-880411KB	103.1	135	87-37-24	47.4	-16	SHORT	
WZZG SET ASIDE: Affiliated with WWOK(AM)								

WAKO-FM LIC	LAWRENCEVILLE BCG COMPAN	276A	3	38-43-23	315.7	78.87	72	
LAWRENCEVILLE	IL	103.1	73	87-39-13	135.3	6.868	CLOSE	
Affiliated with WAKO(AM)								

WAKO-FM APP	STUART K LANKFORD	276A	6	38-43-23	315.7	78.87	72	
LAWRENCEVILLE	IL BPH-891013IH	103.1	75	87-39-13	135.3	6.868	CLOSE	
Affiliated with WAKO(AM)								

NEW	APP	T C MONTE INCORPORATED	277A	6	38-11-58	130.8	3.079	115
SANTA CLAUS	IN BPH-900108NY	103.3	80	86-59-31	310.8	-112	SHORT	
Amended 11/13/91; Received per FCC release #14656 dated 02/06/90,								
tendered per 14673 dated 02/27/90, accepted per 14892 dated 12/31/90;								
PET FOR RECON FILED 1/22/91								

ALLOC	SITE RESTRICTION 4.6 MI	277A		38-09-41	151.4	7.099	115	
SANTA CLAUS	IN DOC-87-597	103.3		86-58-47	331.4	-108	SHORT	
Filing window 12/12-01/11/90 **CLOSED** ; GRANTED EFF 12/11/89								

WKDF	LIC	DICK BCG CO INC OF NASHV	277C	100	36-02-08	176.4	242.6	226
NASHVILLE	TN	BLH-820818AB	103.3	376	86-50-56	356.5	16.62	CLEAR
Affiliated with WKDA(AM)								

PRM	CLASS CHANGE FROM A PROP	278C3		37-50-34	117.5	89.69	89	
RADCLIFF	KY DOC-92-21	103.5		86-06-49	298.0	.685	CLOSE	
PRM adopted 02/04/92, released 02/12/92; SITE RESTRICTION 9.3 MI W								

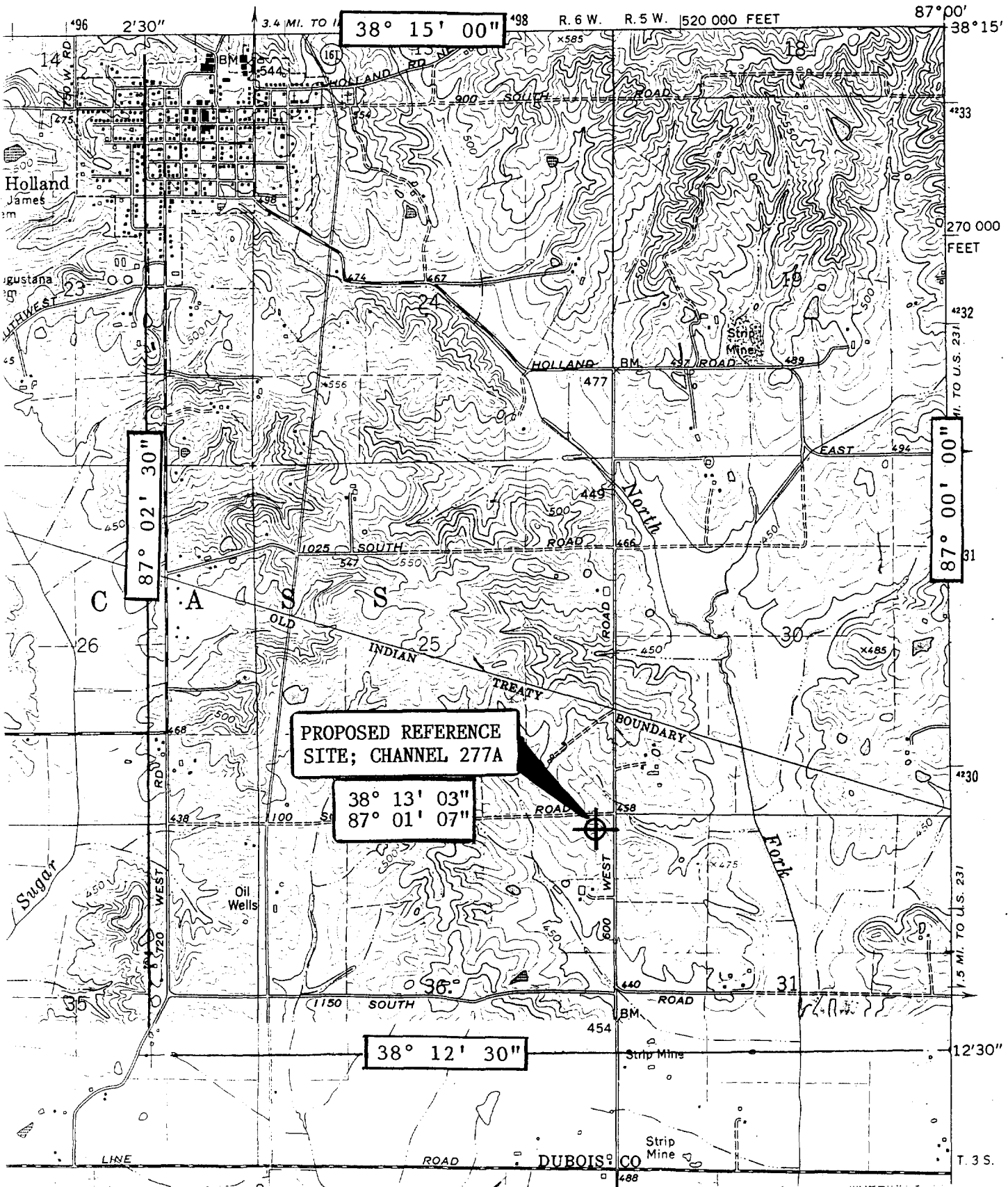
WFIU	LIC	TRUSTEES OF INDIANA UNIV	279B	34	39-08-32	23.7	112.3	69
BLOOMINGTON	IN		103.7	180	86-29-43	204.0	43.30	CLEAR

WZKS	LIC	RADIO 900 INCORPORATED	280A	.95	38-15-20	87.4	110.5	31
LOUISVILLE	KY		103.9	149	85-45-28	268.2	79.47	CLEAR
Was WXLN 07/02/90 per FCC release #137 dated 06/29/90:								
Affiliated with WFIA(AM)								

>> End of channel 277A study <<

HOLLAND QUADRANGLE  
INDIANA  
7.5 MINUTE SERIES (TOPOGRAPHIC)

3600 IV SW  
(HUNTINGBURG)

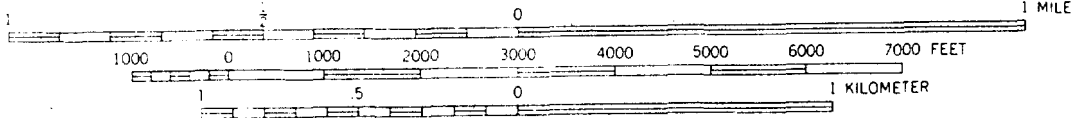


PROPOSED REFERENCE  
SITE; CHANNEL 277A

38° 13' 03"  
87° 01' 07"

38° 12' 30"

SCALE 1:24 000



CONTOUR INTERVAL 10 FEET

CONTOURS FOR  
PROPOSED SITE  
SANTA CLAUS, INDIANA

Service contours based on FCC F(50,50) curves

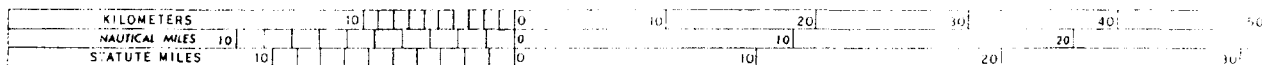
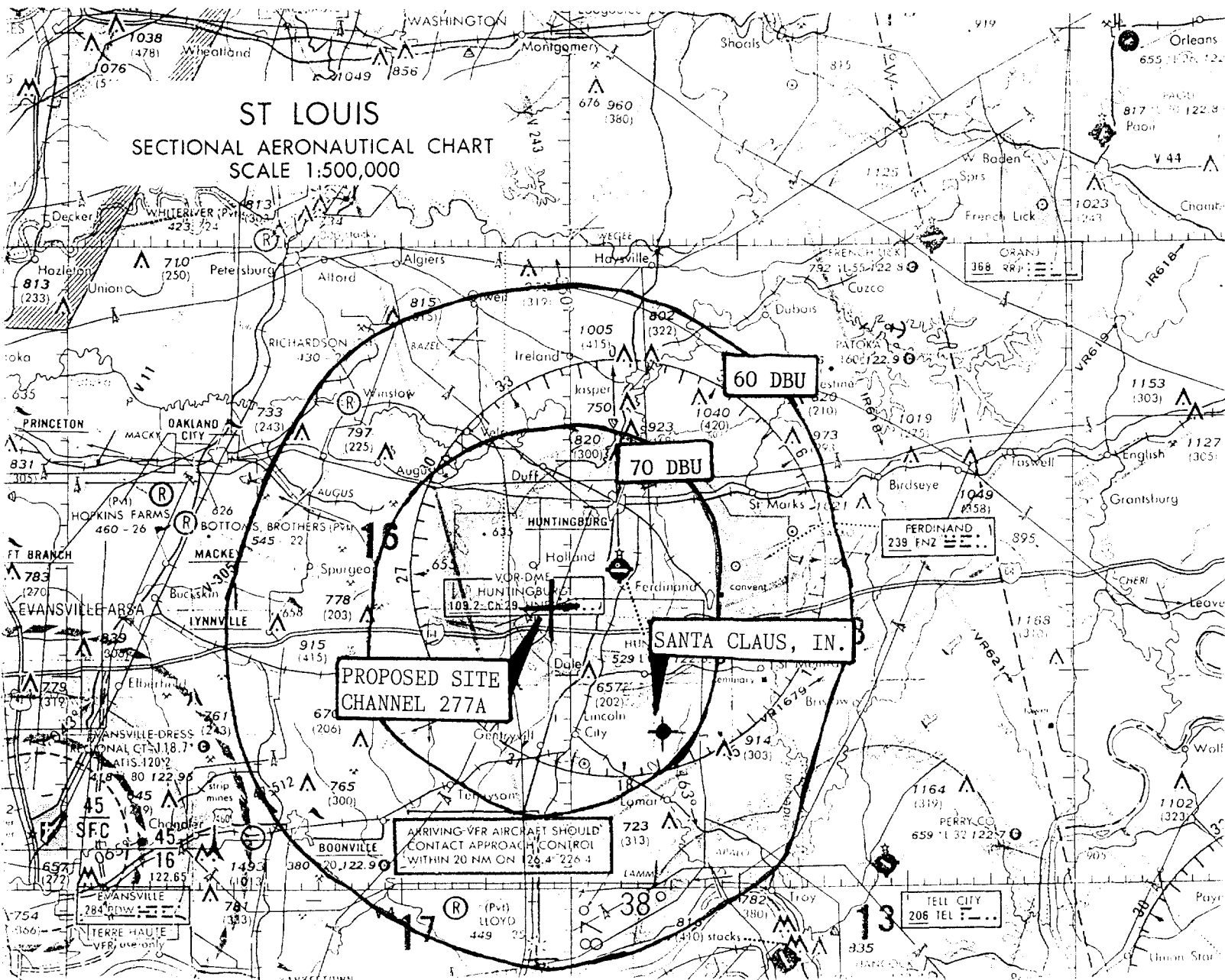
File: PROPOSED SITE CONTOURS CH. 277A Latitude: 38-13-03  
Channel: 277 C/R 245.1 meters ( 804.1 feet) A.M.S.L. Longitude: 87-01-07

Bearing degrees)	HAAT (meters) (feet)	ERP (kilowatts) (dBk)	70 dBu (3.16 mV/m) contour	60 dBu ( 1 mV/m) contour	54 dBu ( .50 mV/m) contour
.0	94.9 311.4	6.000 7.782	15.7 km 9.8 mi	27.6 km 17.2 mi	37.9 km 23.5 mi
45.0	98.2 322.2	6.000 7.782	16.0 km 9.9 mi	28.1 km 17.4 mi	38.4 km 23.9 mi
90.0	83.8 274.9	6.000 7.782	14.6 km 9.1 mi	26.0 km 16.2 mi	35.8 km 22.2 mi
135.0	104.3 342.2	6.000 7.782	16.6 km 10.3 mi	28.9 km 17.9 mi	39.4 km 24.5 mi
138.7	106.3 348.8	6.000 7.782	16.8 km 10.4 mi	29.1 km 18.1 mi	39.7 km 24.7 mi
180.0	118.8 389.8	6.000 7.782	17.8 km 11.1 mi	30.6 km 19.0 mi	41.5 km 25.8 mi
225.0	110.6 362.9	6.000 7.782	17.1 km 10.7 mi	29.7 km 18.4 mi	40.4 km 25.1 mi
270.0	94.1 308.7	6.000 7.782	15.6 km 9.7 mi	27.5 km 17.1 mi	37.7 km 23.4 mi
315.0	94.9 311.4	6.000 7.782	15.7 km 9.8 mi	27.6 km 17.2 mi	37.9 km 23.5 mi
-----					
HAAT:	99.9 327.9				

Note: Radial(s) denoted by "\*" not included in HAAT calculation.

60 & 70 DBU CONTOURS  
FOR PROPOSED SITE  
SANTA CLAUS, INDIANA  
CHANNEL 277A

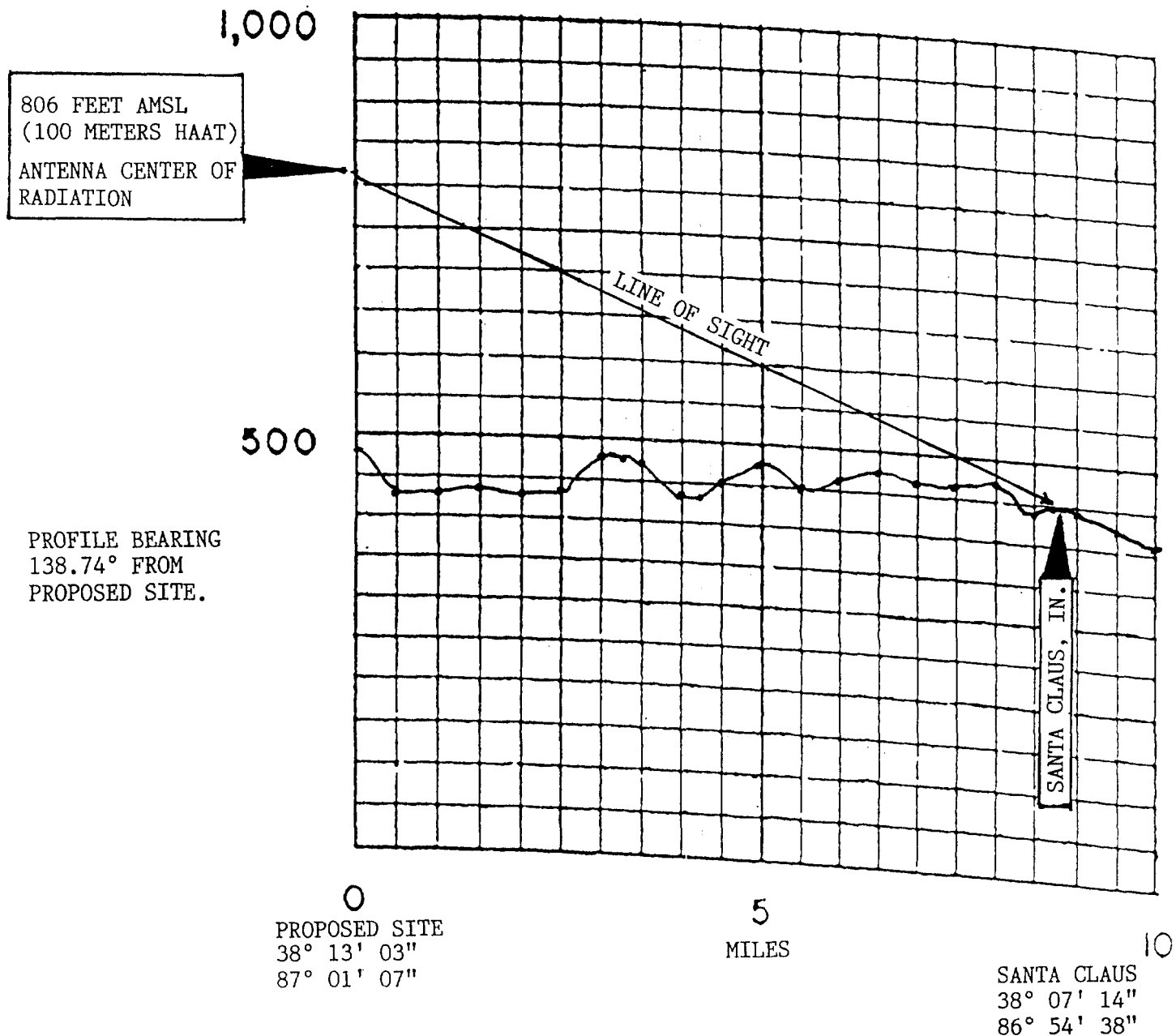
ST LOUIS  
SECTIONAL AERONAUTICAL CHART  
SCALE 1:500,000



ELEVATION  
IN FEET

PROFILE  
BASED ON 1.33X EARTH'S RADIUS

TERRAIN PROFILE  
PROPOSED CHANNEL 277A SITE  
TO SANTA CLAUS, INDIANA



Terrain Profile from NGDC 30-Second Database

Title: TERRAIN DATA 138.74 DEGREES Origin: 38-13-03 87-01-07  
Azimuth: 138.7 degrees Path Length: 10.0 mi Terminus: 38-06-31 86-53-50

Dist. (mi)	Elev. (ft)	Dist. (mi)	Elev. (ft)	Dist. (mi)	Elev. (ft)	Dist. (mi)	Elev. (ft)	Dist. (mi)	Elev. (ft)
0.0	453.9	0.3	437.4	0.5	430.1	0.7	422.8	1.0	428.1
1.2	437.3	1.5	441.8	1.7	441.3	2.0	436.3	2.2	424.9
2.5	441.7	2.7	463.1	3.0	479.1	3.2	482.9	3.5	470.5
3.7	452.5	4.0	439.0	4.2	439.6	4.5	451.5	4.7	467.5
5.0	479.1	5.2	467.4	5.5	448.8	5.7	445.7	6.0	460.3
6.2	473.8	6.5	472.3	6.7	465.7	7.0	459.2	7.2	453.3
7.5	461.0	7.7	481.0	8.0	479.6	8.2	464.1	8.5	440.0
8.7	449.6	9.0	445.1	9.2	435.4	9.5	424.3	9.7	408.7
10.0	406.7								

March 17, 1992

To whom it may concern:

This letter confirms my willingness to consider the use of approximately 3 acres of my property, located at 11469 S. 600 West, Holland, IN, to construct an FM radio tower. Although this letter is not a legally binding commitment, I state my intention to negotiate in good faith for mutually acceptable terms of sale or lease.

Sincerely,

Ray Buse COX  
(Property Owner or  
Authorized Representative)

The farm consisting of 131 acres is for sale.



CERTIFICATE OF SERVICE

I hereby certify that on this 6 day of April, 1992  
a copy of the foregoing document was placed in the United States mail,  
first class postage prepaid, addressed to the following:

Newberry Broadcasting, Inc.  
P.O. Box 457  
Glasgow, KY 42141

T. C. Monte, Inc.  
2500 Cincinnati Common  
Center  
Cincinnati, OH 45202

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Suite 200  
Washington, DC 20006

Robin Queen